

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
APR 18 2019
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
AKRON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON J. WRIGHT, JR.,

Defendant.

) INFORMATION

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) CASE NO. **5:19CR 239**

) Title 21, United States Code,
) Sections 841(a)(1) and (b)(1)(C);
) Title 18, United States Code,
) Sections 1344(2) and 2

GENERAL ALLEGATIONS

JUDGE POLSTER

MAG. JUDGE GREENBERG

1. At all times material to this information, Key Bank was a federally-insured financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. At all times material to this information, Huntington Bank was a federally-insured financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

COUNT 1

(Bank Fraud, 18 U.S.C. §§ 1344(2) and 2)

The United States Attorney charges:

3. The General Allegations set forth in Paragraphs 1 and 2 are incorporated by reference as if fully set forth herein.

4. In or about July 2017, continuing through February 2018, in the Northern District of Ohio, Eastern Division, Defendant RAMON J. WRIGHT, JR., and others known and unknown to the United States Attorney, did knowingly execute, and attempt to execute, a scheme

and artifice to defraud Key Bank and Huntington Bank, federally-insured financial institutions, and to obtain money, funds, credits, assets and other property owned by, and under the custody and control of Key Bank and Huntington Bank, by means of false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Sections 1344(2) and 2.

SCHEME TO DEFRAUD

5. It was part of the scheme and artifice to defraud that RAMON J. WRIGHT, JR. obtained and provided fraudulent and falsified documents in support of applications at Key Bank and Huntington Bank for loans and credit accounts obtained by others, known and unknown to the United States Attorney, involved in the scheme and artifice to defraud.

ACTS IN FURTHERANCE OF THE SCHEME AND ARTIFICE TO DEFRAUD

6. In furtherance of the scheme and artifice to defraud, RAMON J. WRIGHT, JR. performed the following acts in the Northern District of Ohio, including but not limited to:

7. On or about August 16, 2017, Defendant RAMON J. WRIGHT, JR., assisted Person 1 in obtaining a loan in the amount of \$30,150 from Key Bank, loan number *****3965, using fraudulent and falsified documents that misrepresented Person 1's employment, income, and utility account information.

8. On or about August 16, 2017, WRIGHT assisted Person 1 in obtaining a credit account in the amount of \$12,000 from Huntington Bank, account number *****4025, using fraudulent and falsified documents that misrepresented Person 1's employment, income, and utility account information.

9. Subsequent to obtaining the line of credit from Huntington Bank described in paragraph 8, Person 1 made several purchases using the line of credit for which Person 1 did not repay Huntington Bank, resulting in a loss to Huntington Bank.

10. On or about September 23, 2017, WRIGHT assisted Person 2 in obtaining a loan in the amount of \$20,150 from Key Bank, loan number *****1756, using fraudulent and falsified documents that misrepresented Person 2's employment and income.

11. On or about September 23, 2017, WRIGHT assisted Person 2 in obtaining a credit account in the amount of \$9,000 from Huntington Bank, account number *****4899, using fraudulent and falsified documents that misrepresented Person 2's employment, income, and utility account information.

12. Subsequent to obtaining the line of credit from Huntington Bank described in Paragraph 11, Person 2 made purchases using the line of credit for which Person 2 did not repay Huntington Bank, resulting in a loss to Huntington Bank.

All in violation of Title 18, United States Code, Sections 1344(2) and (2).

COUNT 2

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. § 841(a)(1) and (b)(1)(C))

The United States Attorney further charges:


13. On or about August 30, 2018, in the Northern District of Ohio, Eastern Division, Defendant RAMON J. WRIGHT, JR. did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, to wit: approximately 22.42 grams of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The United States Attorney further charges:

14. For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, the allegation of Count 2 is incorporated herein by reference. As a result of the foregoing offense, Defendant RAMON J. WRIGHT, JR., shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violation; and, any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation; including, but not limited to, the following: \$4,765 in U.S. currency.

JUSTIN E. HERDMAN
United States Attorney

By: 
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